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 8 Chapter 11 Trustee

9 UNITED STATES BANKRUPTCY COURT

10 DISTRICT OF NEVADA

11 In re:		CASE NO. BK-21-14978-ABL
12 SILVER STATE BROADCASTING, LLC,		Chapter 11
13 AFFECTS THIS DEBTOR	<input type="checkbox"/>	<i>Jointly Administered with:</i>
14 AFFECTS GOLDEN STATE	<input type="checkbox"/>	Golden State Broadcasting, LLC
15 BROADCASTING, LLC		Case No. 21-14979-ABL
16 AFFECTS MAJOR MARKET	<input type="checkbox"/>	Major Market Radio, LLC
17 RADIO, LLC		Case No. 21-14980-ABL
18 AFFECTS ALL DEBTORS	<input checked="" type="checkbox"/>	<u>Previous Hearing:</u> Date: October 25, 2023 Time: 1:30 p.m.
19		<u>Continued Hearing:</u> Date: December 13, 2023 Time: 1:30 p.m.

21 **THIRD STIPULATION TO CONTINUE HEARING ON RECEIVER W. LAWRENCE**
 22 **PATRICK'S MOTION FOR ALLOWANCE OF ADMINISTRATIVE CLAIM**
 23 **PURSUANT TO 11 U.S.C. §§ 503(b)(3)(E), 503(b)(4) & 543(c)(2)**

24 Michael Carmel, in his capacity as the Chapter 11 trustee ("Trustee") of the bankruptcy
 25 estates of Silver State Broadcasting, LLC, Golden State Broadcasting, LLC, and Major Market
 26 Radio, LLC, by and through his counsel of record Gregory E. Garman, Esq., Talitha Gray
 27 Kozlowski, Esq., and Mary Langsner, Ph.D. of the law firm Garman Turner Gordon LLP, and
 28 W. Lawrence Patrick ("Receiver"), by and through his counsel of record Brett A. Axelrod, Esq.

1 and Nicholas A. Koffroth, Esq. of the law firm Fox Rothschild LLP (the Receiver collectively
2 with the Trustee, the “Stipulating Parties”), stipulate and agree as follows:

3 WHEREAS, on March 23, 2023, the Receiver filed the *Receiver W. Lawrence Patrick’s*
4 *Motion for Allowance of Administrative Claim Pursuant to 11 U.S.C. §§ 503(b)(3)(E), 503(b)(4)*
5 *& 543(c)(2)* [ECF No. 433] (the “Application”).¹

6 WHEREAS, on July 12, 2023, the Trustee and the Receiver entered into a *Stipulation*
7 *Between Chapter 11 Trustee and Receiver W. Lawrence Patrick* (the “Stipulation”) [ECF No.
8 667]. The Stipulation was approved by the Court on July 13, 2023, setting the current hearing
9 (“Hearing”) as well as the Trustee’s opposition and Receiver’s reply briefing deadlines (together,
10 the “Current Briefing Deadlines”). See ECF No. 669.

11 WHEREAS, the Parties continue to dialogue respecting the Application and seek
12 additional time to continue their discussions; therefore the Parties respectfully request a
13 continuance of the Current Briefing Deadlines and the Hearing.

14 NOW, THEREFORE, subject to entry of the Order approving this Stipulation, which
15 Order has been submitted to the Court concurrently herewith, the Trustee and the Receiver
16 hereby stipulate and agree as follows:

17 1. That the Hearing on the Application shall be continued to **December 13, 2023, at**
18 **1:30 p.m. prevailing Pacific Time**, or the next available date that is convenient for the Court
19 (the “Continued Hearing”).

20 2. That the Current Briefing Deadlines shall be continued as follows: Any
21 opposition by the Trustee to the Application shall be in writing and filed by November 29, 2023.
22 Any such opposition shall be served in accordance with Fed. R. Bankr. P. 2002. Any reply to
23 such opposition shall be filed and served in accordance with Fed. R. Bankr. P. 2002 by
24 December 6, 2023, by the Receiver.

25
26 ¹ All references to “Section” herein shall be to the Bankruptcy Code appearing in Title 11 of the U.S. Code; all
27 references to a “Bankruptcy Rule” shall refer to the Federal Rules of Bankruptcy Procedure; and all references to a
28 “Local Rule” shall refer to the Local Rules of Bankruptcy Practice of the U.S. District Court for the District of
Nevada.

1 Dated this 22nd day of September, 2023.

2 GARMAN TURNER GORDON LLP

FOX ROTHSCHILD LLP

3 By: /s/ Mary Langsner

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10 Chapter 11 Trustee

By: /s/ Brett A. Axelrod

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